

EXHIBIT A

Form of Production

The Parties are prepared to engage in reasonable electronic discovery in response to discovery requests.

According to the document preservation obligations imposed by the Federal Rules of Civil Procedure, the Parties agree to preserve potentially relevant active data and associated metadata in native format.

The Parties agree to produce scanned/paper documents and electronically stored information (ESI) in the following manner:

Document Image Format: The parties shall produce documents as single-page, black and white Group IV tiffs at 300 dpi. If a party believes that color is important to understand a particular document, a party may request that the document be produced in color in JPEG format. The requesting party and the producing party will negotiate in good faith regarding the requesting party's need for such production. Electronic files that cannot be readily converted to an image format, shall be produced with a tiff image placeholder and in their native format. For this particular matter, such electronic files include: spreadsheets (Excel), presentations (Powerpoint), databases (Access), audio files and video files.

File Identification: The parties shall endorse production images with a sequential padded alphanumeric bates number (e.g. ABC000001) and appropriate protective declaration. Production images shall be named to match the corresponding page bates number endorsement. (e.g. ABC000001.tif). Native files shall be named to match the endorsed bates number on the corresponding tiff image placeholder page (e.g. ABC000001.xls).

Proprietary Programs: To the extent that documents produced cannot be rendered or viewed without the use of third party or proprietary software, the Parties shall meet and confer to minimize any expense or burden associated with the production of such documents in an acceptable format, including issues as may arise with respect to obtaining access to any such software and operating manuals which are the property of a third party.

OCR or Extracted Text: The Parties also shall provide scanned/paper documents and ESI with optical character recognition ("OCR") text by providing external .TXT text files on a document level basis. In addition, TIFFs produced from ESI should be accompanied by corresponding external TXT files containing the extracted text, unless the document has been redacted or was originally an image type file in which case an external TXT file containing the text extracted by OCR is an acceptable text format. The external .TXT files shall be named with the Production Begin Number. The receiving party accepts the text-searchable format "as is" and the producing party accepts no liability as to the accuracy of searches conducted on those files.

Load Files: For each production set, EU requests a .OPT unitization file (for use with Relativity) to link the Production Begin Number to an image or range of images and to unitize the production images into their logical units.

EU also requests a comma-separated .DAT load file (compatible with Relativity), including the following metadata:

All - Paper/ESI

Production Begin Number
Production End Number
Production Begin Attachment
Production End Attachment
Page Count
Confidential Designation
Custodian

ESI – email

To
From
CC
BCC
Email Subject
Date Sent/Time Sent
Date Rcvd/Time Rcvd
MD5 Hash

ESI – electronic files

Author
File/Folder Path
Date Created/Time Created
Date Last Modified/Time Last Modified
Title
File Size
Document Extension
MD5 Hash

All metadata date fields shall be conveyed in Central Standard Time (CST). The parties shall use the following delimiters (commonly known as Concordance delimiters) for the metadata load file: ASCII 20 (comma) as a field delimiter, ASCII 254 (quote) as a text qualifier. The parties may also use, depending on the preference of the receiving party, the following delimiters: ASCII 59 as a multientry, ASCII 13 as a carriage return, and ASCII 174 as a newline delimiter.

De-Duplication: The Parties shall take steps to reasonably avoid the production of duplicate ESI. De-duplication of non-email ESI shall be performed prior to production by removing any additional document(s) with identical MD5 hash values to the one being produced. Emails shall be deduplicated by either matching all of the following metadata fields: to, from, cc, bcc, date/time, subject and attachments, or by generating a hash (MD5) signature based on the reviewable content including attachments but excluding message formatting.